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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ORACLE AMERICA, INC., ORACLE
INTERNATIONAL CORPORATION, and
TEXTURA CORPORATION,

Plaintiffs,

vs.

PROCORE TECHNOLOGIES, INC.,
PROCORE PAYMENT SERVICES, INC.,
AND MARK MARIANO,

Defendant.

Case No. 4:24-cv-07457-JST

**JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING BRIEFING
SCHEDULE FOR PROCORE'S MOTION
TO COMPEL PARTICULARIZED
TRADE SECRET DISCLOSURE (DKT.
174)**

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Oracle America, Inc., Oracle
2 International Corporation, and Textura Corporation (“Oracle”) and Defendants Procore
3 Technologies, Inc. and Procore Payment Services, Inc. (“Procore”) by and through their undersigned
4 counsel, hereby jointly stipulate and agree, subject to the approval of the Court, as follows:

5 WHEREAS, Procore filed a Motion to Compel Particularized Trade Secret Disclosure by
6 Oracle (“Motion”) (Dkt. 174);

7 WHEREAS, the Opposition to this Motion is due on December 9, 2025, the Reply in support
8 of this Motion is due on December 16, 2025, and the hearing for this Motion is set for January 8,
9 2026 at 9:30 a.m.;

10 WHEREAS, the parties request that the deadline for the Opposition be extended by 7 days
11 to December 16, 2025 and the deadline for the Reply be extended to December 30, 2025. The
12 parties request the extensions in view of commitments over the Holidays and because the majority
13 of Oracle’s counsel of record (including Adam Alper, Michael De Vries, Akshay Deoras, and
14 Kendra Delaney) have a pretrial conference scheduled for December 9, 2025—the same day as the
15 current Opposition deadline—in *Applied Materials, Inc. v. Demaray*, Case No. 5:20-cv-09341-EJD
16 (N.D. Cal.). This pretrial conference was set on March 28, 2025, prior to Procore filing its Motion.
17 *Id.*, Dkt. No. 495. In view of the parties’ agreement for an extension to Oracle’s Opposition
18 deadline, the parties also agree to a commensurate extension to Procore’s Reply deadline;

19 WHEREAS, the first modification of time in this case was the parties’ stipulation that
20 provided a 30-day extension for Procore Technologies, Inc. and Procore Payment Services, Inc. and
21 a 25-day extension for Mr. Mariano to respond to Plaintiffs’ Complaint (Dkt. 30) such that
22 Defendants’ deadline to respond to the Complaint was extended to December 20, 2024;

23 WHEREAS, the second modification of time in this case was the Court’s Order granting the
24 parties’ stipulation to extend the deadline to file Oppositions to Defendant Mark Mariano’s Motion
25 to Compel Arbitration and to Stay Proceedings Pending Arbitration or Alternative Motion to
26 Dismiss (Dkt. 38) and Defendants Procore Technologies, Inc. and Procore Payment Services, Inc.’s
27 Motion to Stay Pending Arbitration of Claims against Mr. Mariano or Alternative Motion to Dismiss
28

(Dkt. 40) to January 24, 2025, the deadline to file Replies in support of these Motions to February 7, 2025, and to reschedule the hearings for these Motions to March 6, 2025 (Dkt. 42);

WHEREAS, the third modification of time in this case was the parties' stipulation that provided a 14-day extension for Defendants to respond to Plaintiffs' Complaint (Dkt. 80), such that Defendants' deadline to respond to the Complaint was extended to May 7, 2025;

WHEREAS, this extension will not alter the date of any event or any deadline already fixed by Court Order;

WHEREAS, the Court has not previously stated that no further extensions will be granted. Entry and modification of the above deadlines will not impact any other scheduling order deadlines;

NOW THEREFORE, the Parties hereby stipulate and request that the Court permit the following adjustments:

| Deadline/Event | Current Deadline | Modification |
|--------------------------------------|-------------------|-------------------|
| Oracle's Opposition to Motion | December 9, 2025 | December 16, 2025 |
| Procore's Reply in Support of Motion | December 16, 2025 | December 30, 2025 |

DATED: December 4, 2025

/s/ Ingrid Petersen

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SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the other signatory.

Dated: December 4, 2025

Ingrid Petersen
Ingrid M. Petersen

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Laurel Beeler
United States Magistrate Judge